



Indiana Department of Environmental Management
Office of Air Management
Rule Fact Sheet
October 4, 2000

**Test Procedures for Determining Capture Efficiency
for Volatile Organic Compound Emissions
#00-171 (APCB)**

Overview

Incorporates by reference capture efficiency protocols and test methods from 40 CFR 51 and 40 CFR 63 for states to meet their source surveillance requirements under the Clean Air Act. This rulemaking will be submitted to U.S. EPA as a revision to the state implementation plan.

Citations Affected

Amends 326 IAC 8-1-4

Affected Persons

Industries required to perform capture efficiency for compliance with volatile organic compound rules, such as printing and publishing facilities.

Potential Cost

The test protocols and test methods incorporated into this rule will provide a less costly method to companies who were formerly required to have total temporary or total permanent enclosures to capture their volatile organic compound emissions.

Description

In 1990, U.S. EPA replaced the traditional liquid/gas mass balance determinations with new protocols that involved permanent or temporary total enclosures or building enclosures. Companies expressed concerns

about the high cost of the required enclosure methods. In 1992, U.S. EPA placed a moratorium on the capture efficiency enclosures while a 12-month study was performed to find less costly test methods. On May 30, 1996, seven new test methods and two protocols for requesting alternative test methods were issued as part of the Printing and Publishing NESHAP (61 FR 27131). These test methods and protocols apply to a variety of types of industries that use volatile organic compounds and are subject to emission limitations established in 326 IAC 8. This rulemaking incorporates by reference the following test methods from that Federal Register:

- Method 204 Criteria for and Verification of a Permanent or Temporary Total Enclosure
- Method 204A Volatile Organic Compounds (VOC) Content in Liquid Input Stream
- Method 204B VOC Emissions in Captured Stream
- Method 204C VOC Emissions in Captured Stream (Dilution Technique)
- Method 204D VOC Emissions in Uncaptured Stream from Total Temporary Enclosure
- Method 204E VOC Emissions in Uncaptured Stream from Building Enclosure
- Method 204F VOC Content in Liquid Input Stream (Distillation Approach)

–Data quality objective and the lower confidence limit approaches for alternative capture efficiency protocols and test methods.

Consideration of Factors Outlined in Indiana Code 13-14-8-4

Indiana Code 13-14-8-4 requires that in adopting rules and establishing standards, the board shall take into account the following:

- 1) All existing physical conditions and the character of the area affected.
- 2) Past, present, and probable future uses of the area, including the character of the uses of surrounding areas.
- 3) Zoning classifications.
- 4) The nature of the existing air quality or existing water quality, as appropriate.
- 5) Technical feasibility, including the quality conditions that could be reasonably be achieved through coordinated control of all factors affecting the quality.
- 6) Economic reasonableness of measuring or reducing any particular type of pollution.
- 7) The right of all persons to an environment sufficiently uncontaminated as not to be injurious to:
 - (A) human, plant animal, or aquatic life; or
 - (B) the reasonable enjoyment of life and property.

Consistency with Federal Requirements

The amended rule is consistent with federal laws and guidance.

IDEM Contact

Additional information regarding this rulemaking action can be obtained by calling (800) 451-6027 (in Indiana), press 0 and ask for Suzanne Whitmer, Rule Development Section, Office of Air Management, (or extension (2-8229) or dial (317) 232-8229.